REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed October 24, 2008 ("Office Action"). Claim 49 is amended herein and includes definitions provided in the specification as originally filed. No new matter is introduced. No claim is newly added. Claims 49, 51-60 and 65-73 remain pending. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 103

Claims 49, 51-52, 56-59, 65, 68-70 and 73 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0105770 ("MacLeod") in view of U.S. Patent Application Publication No. 2003/0208387 ("VanDusen"), further in view of newly cited U.S. Patent Application Publication No. 2002/0049626 ("Mathias"). The rejection is traversed. Arguments submitted in the previous Replies pertaining to MacLeod remain pertinent to the rejection and therefore are incorporated herein by reference. Claims 65 and 70 contain similar language as claim 49. Accordingly, traversal of the rejection will be collectively addressed as it pertains to claim 49.

Claim 49, as previously presented, recites:

> A method for integrating legacy data into a content management system, comprising:
>
> analyzing a set of legacy data residing in a legacy repository external to said content management system;
>
> generating a set of content types to represent the set of legacy data based on the analysis of the legacy data, wherein one of the content types comprises a policy annotation, the policy annotation comprising management information including a workflow corresponding to the content type;
>
> saving the set of content types in a memory;
>
> generating a set of content type objects corresponding to the set of content types;
>
> generating a set of content instance objects from the content type objects;
>
> associating each of the set of legacy data with at least one of the content instance objects, wherein at least one of the content instance objects is associated with two or more datum of the set of legacy data, each of the datum residing in a distinct data storage; and

managing the set of legacy data using the content instance objects, wherein the two or more datum are managed as a single entity using the at least one content instance object.

Thus, embodiments as claimed in claim 49 are directed to a method for integrating legacy data into a content management system. The method may include analyzing a set of legacy data residing in a legacy repository external to the content management system, generating a set of content types to represent the set of legacy data based on the analysis of the legacy data, saving the set of content types in a memory, generating a set of content type objects corresponding to the set of content types, associating each of the set of legacy data with at least one of the content instance objects and managing the set of legacy data using the content instance objects. One of the content types may include a policy annotation having management information including a workflow corresponding to the content type. At least one of the content instance objects may be associated with two or more datum of the set of legacy data. The legacy data, which resides at a data repository external to the content management system, can then be managed using the content instance objects, which are instantiated at the content management system. In this way, instead of having to import all of the legacy data into a repository, a user can merely create content types based on an existing model and then use an attach method to allow the new system to take over management of the existing data.

MacLeod is generally concerned with a directory schema with object classes that have flexible attributes such that attributes of an object can be extended independent of modifications. To this end, MacLeod provides a flexible content class, wherein the flexible content class includes a flexible attribute. *See* MacLeod, Figure 4. The flexible attribute content class can be assigned any number of values. *See* MacLeod, paragraph [0054]. Thus, the application of MacLeod can assign any type of information to attributes of objects instantiated from the same object class, and this ability is accomplished without needing to modify the directory schema to create new structural object classes or attributes. *See* MacLeod, paragraph [0058], [0062].

VanDeusen is generally concerned with a method of doing business and a security instrument. As submitted in the Reply to the Office Action mailed on February 6, 2008, VanDusen appears to teach content management of content items in a website through the use of metadata. *See* VanDusen, paragraph 0078. VanDusen teaches that when new content items are added to a system, users apply category metadata to the content items in the system

and this metadata appears to be used to develop profiles for users which may be used to personalize content and product information shown to the users. *See* VanDusen, paragraph 0080.

Mathias is generally concerned with a method and system for interfacing clients with relationship management (RM) accounts and for permissioning marketing. A CRM system may collect data from external databases and third party information providers. *See* Mathias, paragraph [0062]. Mathias teaches that legacy systems within large enterprises typically are mutually-incompatible and are not configured to effectively communicate with each other. *See* Mathias, paragraph [0070].

In the rejection, the Examiner states that MacLeod teaches a method for integrating data into a content management system, including analyzing a set of data and generating a set of content types to represent the set of data based on the analysis of the data. Applicant respectfully disagrees and maintains that MacLeod is not concerned with legacy systems. As submitted in the Reply to the Office Action mailed on October 15, 2007, MacLeod explicitly describes that a directory schema is a collection of base content classes and associations and that directory schemas are typically very carefully designed (and hence cannot to be readily altered) to provide content classes to meet present and future requirements of a directory. *See* MacLeod, paragraphs 2-3. As such, MacLeod's description of a content class defining the purpose or content of an item by containing as its elements a list of properties appropriate for that purpose, or the teaching of a flexible attribute does not address the problems of integrating legacy data. Thus, MacLeod does not appear concerned with analyzing legacy systems or otherwise integrating legacy data into a content management system as recited in claim 49.

Applicant respectfully submits that the teachings of VanDeusen fail to remedy the deficiencies of MacLeod. In the rejection, the Examiner states that VanDeusen discloses analyzing a set of data and generating a set of content types and teaches that a key component of a broad content management solution is the strategic use of metadata (site categories). However, VanDeusen is concerned with the situation in which business users add new content items to a system (e.g., a website) and teaches applying site category metadata information to the items so that it becomes easier for end users to find information of interest to them. As an example, an end user of a portal can request all items about a given sports team, or all articles about a given league written by a given author. Because every piece of content that an end

user views is tracked, it becomes easier to create a specific profile of that user. *See* VanDeusen, paragraph [0080]). However, VanDeusen's method of tracking what content is viewed by a user of a website and applying site category metadata does not read on analyzing data and generating a set of content types, as recited in claim 49.

Similarly, Applicant respectfully submits that the teachings of Mathias fail to remedy the deficiencies of MacLeod and VanDeusen. In the rejection, the Examiner states that Mathias teaches legacy data residing in a legacy repository external to the content management system, and that Mathias' teachings would have allowed MacLeod and VanDeusen to provide an effective communication, integration, organization of data collection from a variety of sources such as legacy databases. Mathias describes an external database coupled to a data interchange, in which the external database contains data that is appropriate for inclusion into a data repository. Thus, a client relationship manager (CRM) system collects data from relationship and product managers via user terminals, as well as external databases and third party information providers. *See* Mathias, paragraphs [0062], [0070]. However, Mathias describes a data interchange that is responsible for transferring and translating data from one part of a CRM system to another. The data interchange may have a data stream handler, which converts data into a stream of messages, a cross-referencing system, which allocates an identifier to every client of an enterprise and maintains a mapping between local identifiers and corresponding global client identifiers, and a network interface. *See* Mathias, paragraphs [0064-0068]. The use of a data interchange to communicate between different portions of a data management system represents a situation in which embodiments as claimed in claim 49 can advantageously avoid.

Although itself has no force of law, the M.P.E.P. restates the following law: The rationale to support a conclusion that the claim would have been obvious is that all the claimed elements were known in the prior art and one skilled in the art could have combined the elements as claimed by known methods with no change in their respective functions, and the combination yielded nothing more than predictable results to one of ordinary skill in the art. *KSR*, 550 U.S. at ___, 82 USPQ2d at 1395; *Sakraida v. AG Pro, Inc.*, 425 U.S. 273, 282, 189 USPQ 449, 453 (1976); *Anderson's-Black Rock, Inc. v. Pavement Salvage Co.*, 396 U.S. 57, 62-63, 163 USPQ 673, 675 (1969); *Great Atlantic & P. Tea Co. v. Supermarket Equipment Corp.*, 340 U.S. 147, 152, 87 USPQ 303, 306 (1950). "[I]t can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the

claimed new invention does." *KSR*, 550 U.S. at ___, 82 USPQ2d at 1396. If any of these findings cannot be made, then this rationale cannot be used to support a conclusion that the claim would have been obvious to one of ordinary skill in the art. *See* M.P.E.P. 2143.

As submitted above and previously, Macleod, VanDusen, and Mathias disclose uniquely different inventions that solve different problems, none of which pertains to helping business users to manage their legacy data without changing either the structure or the location of the data. As an example, paragraph 22 of Macleod discloses a definition of a schema. Paragraph 22 of Macleod does not whatsoever disclose "analyzing a set of data and generating a set of content types to represent the set of data based on the analysis of the data," as the Examiner stated on page 3 of the Office Action. VanDusen, in a completely different context, discloses using metadata to tag or mark content items (paragraph 78) and how a business manager might define a set of policies for controlling the management of product promotions (paragraphs 133 and 276). The rejection simply fails to identify any reason whatsoever that would have prompted a person of ordinary skill in the relevant field to combine a schema definition as disclosed by Macleod and a method of tagging content items to be associated with workflow templates for the purpose of controlling the management of product promotions as disclosed by VanDusen. Furthermore, in this example, the resulting combination of Macleod and VanDusen fails to arrive at a method comprising "analyzing a set of legacy data residing in a legacy repository external to said content management system" and "generating a set of content types to represent the set of legacy data based on the analysis of the legacy data, wherein one of the content types comprises a policy annotation, the policy annotation comprising management information including a workflow corresponding to the content type," as set forth in claim 49.

What is more, the Examiner stated on page 8 of the Office Action that the newly cited Mathias may allow Macleod and VanDusen to "provide an effective communication, integration, organization of data collection from [a] variety of sources such as legacy databases." Assuming that Macleod, VanDusen, and Mathias were combinable, the Examiner's statement actually supports Applicant's position that the combination of Macleod, VanDusen, and Mathias fails to read on embodiments as claimed in claim 49. As submitted above, embodiments as claimed in claim 49 eliminate the need to collect/migrate the legacy data from an external data repository. A user can merely create content types based on an existing model and then use an attach method to allow the new system to take over management of the existing data. This

method obviates any need to manipulate the data itself, or to move the data to an additional repository. Accordingly, the legacy data residing in the external data repository can be managed by a new content management system without changing the structure or the location of the data. Since the combination of Macleod, VanDusen, and Mathias would have involved collecting data from a variety of sources, eliminating the need of data collection would not have been a predictable result to one of ordinary skill in the art at the time the invention was made. At least for this reason, this rationale cannot be used to support a conclusion that embodiments as claimed would have been obvious to one of ordinary skill in the art at the time of the invention.

As a good faith effort to expedite the prosecution of the present application, claim 49 is amended herein without prejudice or disclaimer. As amended, claim 49 recites:

> A method for integrating legacy data into a content management system, comprising:
> analyzing a set of legacy data residing in a legacy repository external to said content management system;
> generating a set of content types to represent the set of legacy data in the content management system based on the analysis of the legacy data, wherein one of the content types comprises a policy annotation, the policy annotation comprising management information including a workflow corresponding to the content type;
> saving the set of content types in a memory;
> generating a set of content type objects corresponding to the set of content types, wherein a content type object is an instantiation of a content type embodied in the content management system;
> generating a set of content instance objects from the content type objects, wherein each content instance object is an instantiation of a content instance and is associated with a content type object or a content type;
> associating each of the set of legacy data with at least one of the content instance objects, wherein at least one of the content instance objects is associated with two or more datum of the set of legacy data, each of the datum residing in a distinct data storage; and
> managing the set of legacy data residing in the legacy repository using the content instance objects of the content management system, wherein the two or more datum are managed as a single entity using the at least one content instance object.

It is respectfully submitted claim 49 recites subject matter not reached by the combination of Macleod, VanDusen, and Mathias under 35 U.S.C. § 103(a) and therefore should be allowed. For similar reasons, claims 51-52, 56-59, 65, 68-70 and 73 are also submitted to be allowable over the combination of Macleod, VanDusen, and Mathias under 35 U.S.C. § 103(a). Accordingly, withdrawal of this rejection is respectfully requested.

Claims 53-55, 60, 66-67 and 71-72 were rejected under 35 U.S.C. § 103(a) as being unpatentable over MacLeod in view of VanDusen and further in view of Mathias as applied to claims 49, 51-52, 56-59, 65, 68-70 and 73 above, further in view of U.S. Patent Application Publication No. 2004/0187100 ("Thiruvillamalai"). The rejection is traversed. Arguments submitted in the previous Replies pertaining to Thiruvillamalai remain pertinent and thus are incorporated herein by reference.

Thiruvillamalai is generally concerned with data store for arbitrary data types with safe type storage and retrieval, and describes a type construct that at compile time is instantiated to generate a unique type of data store that can hold listed types of arbitrarily typed data objects and methods to access the data store in a manner that allows any object of a listed type to be put in the data store. *See* Thiruvillamalai, paragraph [0007].

In the rejection, the Examiner states that Thiruvillamalai discloses generating values for the set of keys for each of the content instance objects. Applicant respectfully disagrees and submits that Thiruvillamalai describes a Put method that maintains a type index in association with each element and a Get method that validates that the type of object that was requested in the call to the Get method matches the object type that was stored in the Put method, and the Get method further returns the element data if there is a type match. However, Thiruvillamalai does not appear to generate anything other than a run-time exception in the event the Get is unable to validate that the type of object that was requested in the call to the Get method matches the object type that was stored in the Put method. *See* Thiruvillamalai, paragraph [0007]. Furthermore, one of ordinary skill in the art, at the time the invention was made, had no apparent reason to combine Thiruvillamalai with three other distinct inventions, namely, Macleod, VanDusen, and Mathias. Even if Macleod, VanDusen, Mathias, and Thiruvillamalai were properly combinable, the resulting combination still fails to read on embodiments as set forth in claims 53-55, 60, 66-67 and 71-72 for at least the reasons submitted above with

reference to claims 49, 51-52, 56-59, 65, 68-70 and 73. Accordingly, withdrawal of this rejection is respectfully requested.

CONCLUSION

Applicant respectfully requests that the Examiner withdraw his rejections of the claims. Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of claims 49, 51-60 and 65-73. The Examiner is invited to telephone the undersigned at the number listed below for discussing an Examiner's Amendment or any suggested actions for accelerating prosecution and moving the present application to allowance.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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Date: January 29, 2009

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